



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

March 31, 2008

Mike Hicks  
District of Columbia Division  
Federal Highway Administration  
1990 K Street, NW  
Suite 510  
Washington DC 20006-1103

**Subject: South Capitol Street Project, Replacement of the Fredrick Douglas Memorial Bridge, from Firth Sterling Avenue SE to Independence Avenue and the Suitland Parkway from Martin Luther King, Jr. Avenue SE to South Capitol Street., Washington, District of Columbia. CEQ# 20080053**

Dear Mr. Hicks:

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) offers the following comments regarding the South Capitol Street Project Draft Environmental Impact Statement (DEIS). The DEIS was prepared by the District of Columbia Department of Transportation (DDOT) in conjunction with the Federal Highway Administration (FHWA).

This Draft Environmental Impact Statement (DEIS) evaluates the proposed action which is designed to transform the existing South Capitol Street into an urban gateway to the US Capitol and District of Columbia's Monumental Core that improves safety, accessibility, multimodal mobility, and supports economic development. A major element of the project is the construction of a new Frederick Douglass Memorial Bridge across the Anacostia River. There are two build alternatives proposed by the project, and a no action alternative. Each Build Alternative includes elements that accommodate existing and potential transit facilities, provides enhanced pedestrian and bicycle facilities, and streetscape features. An identification of a preferred alternative will be made after comments on the DEIS and the public hearing have been received and evaluated.

EPA rates both of the build alternatives EC-2, environmental concerns, and insufficient information, based mainly on some additional information required for the air analysis. A copy of the EPA EIS rating system is enclosed for your information.

## General Comments

The executive summary mentions, in characterizing the existing conditions of South Capital Street, the issue of through traffic and how through traffic has contributed to the present condition of the roadway. Please provide additional clarification on how the through traffic is addressed by the build alternatives. Page 2-26 states that the build alternatives reclassify South Capital Street as a principal arterial.

If lighting is necessary, we recommend FHWA and DDOT consider using energy-efficient, low-impact lighting.

The FHWA and DDOT should be commended in committing to use LID BMPs to implement Low Impact Design standards. More information would be helpful in determining the pre LID storm water flows and the quantities that are estimated to be reduced in the application of LID techniques. Page 2-28 describes streetscape concepts that include low impact development. It would be extremely useful to be able to quantify, even if it's an approximate estimate, on the amount of benefit this approach will realize.

It is EPA understanding that the storm sewer system in the project area are combined sanitary and storm water. It is suggested that the project storm water be routed through appropriate storm water BMPs and discharge directly to the Anacostia River rather than to the combine sewer system.

## Detail comments

Page 3-48 Section 3.7.2. The discussion of groundwater withdraws refers to data from USGS in 1984. Is there any recent data that confirms the withdraws cited in the text.

Page 3-63 Section 3.12 Cultural Resources. Does the information in the 4<sup>th</sup> paragraph that describes Criteria Considerations conflict with the information on page 3-66?

Page 3-76 Section 3.13. The fourth paragraph describes phase 1 and phase 2 screening for hazardous waste sites. Is there a reference to the Phase 2 protocol, guidance or procedures used in the phase 1 and 2 screening?

Page 3-102 Section 3.16. Transportation and Traffic. The document identifies rush hour peak traffic conditions. Are there any significant traffic issues during weekend conditions that affect this analysis?

Page 4-1 Section 4.1.1. In the description of the no build alternative please add language on the how the no build alternative addresses safety, multimodal mobility and accessibility.

Page 4-13 Section 4.2.2.6. Please provide further clarification on how the build alternatives address the two or three worst safety concerns as identified in section 3 of the DEIS – the affected environment.

Page 4-29, Section 4.5.2 Project Level Emission Burden Assessment The section discusses a project level emission burden assessment for all required criteria pollutants, yet the table is using regional emission numbers reflective of the entire Washington Metropolitan area for 2030. Please re-title this section and rewrite the paragraph to reflect that the project has been analyzed as of part of the regional emissions basis which is allowable, since the project is included in the conforming regional transportation plan.

Page 4-29, Section 4.5.3.1 PM2.5 Analysis This section needs to be redone as it does not follow the referenced March 29, 2006 FHWA/EPA guidance on doing PM2.5 hot spot analysis. Using regional VMT numbers to determine that the project is not of air quality concern is not a project level determination. At a minimum, present the specific current AADT for the project area and corresponding percentage of diesel trucks for the project and the projected AADT and truck percentages for the new project when it is opened for traffic and for the peak design year to make an initial determination as to whether this project may cause a PM2.5 emissions hot spot problem. In addition since this project also includes new ramps and intersections, a discussion of the level of service for each of these new segments when completed should be included.

Page 4-49 Section 4.6.3 Noise Mitigation. The noise mitigation section lists potential mitigation measures but dismisses each measure. Please provide additional information on the noise mitigation to be implemented.

Thank you for the opportunity to provide comments on the DEIS. Should you have any questions regarding our comments concerning the NEPA process, please contact me at 215-814-3367.

Sincerely,

William Arguto  
NEPA Team Leader  
Environmental Programs Branch

Enclosure